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5 Attorney for Defendant
VALERIAN CHIOCHIU

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA, } Case No. 2:17-CR-306-JCM-VCF
11 } STIPULATION AND
12 } ORDER CONTINUEING SENTENCING
13 } Current Date: March 19, 2021 at 11:00 a.m.
14 }
15 }

16 Defendant Valerian Chiochiu by and through his counsel of record, Alan Eisner
17 and Plaintiff United States of America, by and through its counsel of record, Chad W.
18 McHenry, Trial Attorney, Organized Crime and Gang Section, U.S. Department of
19 Justice, hereby stipulate as follows:

- 20 1) Defendant pled guilty pursuant to plea agreement on July 31, 2020, and
21 sentencing and disposition was set for December 11, 2020. (Dkt 730.)
- 22 2) The court again continued sentencing on October 23, 2020 to the present
23 date of March 19, 2021. (Dkt. 756).
- 24 3) On October 29, 2020 the probation department disclosed its Presentence
25 Investigation Report, which was revised and disclosed to the parties on February 12,
26 2021.
- 27 4) Defense counsel requires additional time to review the presentence
28 investigation report, to adequately prepare defendant's sentencing position and to
adequately prepare for the sentencing hearing.

1 5) The government, anticipating the calling of two witnesses to the hearing,
2 was prepared to proceed. However, after conferring with its witnesses and confirming
3 their future availability, the government has no objections to the continuance within the
4 time period proposed below.

5 6) Based on the forgoing, the parties respectfully request the Court to
6 continue the sentencing in this matter to a date and time at the convenience of the Court,
7 but in order to accommodate the government's witnesses, no later than September, 2021,
8 and not during the week of April 5-9, 2021.

9 IT IS SO STIPULATED.

Respectfully submitted,

EISNER GORIN LLP

13 | Dated: March 9, 2021

s/Alan Eisner

**ALAN EISNER
Attorney for Defendant
VALERIAN CHIOCHIU**

Dated: March 9, 2021

s/ Chad McHenry

CHAD McHENRY, U.S DEPT OF JUSTICE
Trial Attorney
Attorney for Plaintiff
UNITED STATES OF AMERICA

1
2 ORDER
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5 Based upon the representation of counsel and for good cause shown, the Court
6 finds that good cause exists, taking into account the public interest in the prompt
7 disposition of criminal cases.
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9 Therefore, IT IS HEREBY ORDERED that:
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11 The sentencing date is continued to June 18, 2021 at 10:00 A.M.
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13 Dated: March 15, 2021.

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16 HON. James C. Mahan
17 United States District Judge
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